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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

LEE REED,

Petitioner,

vs.

CALVIN JOHNSON, *et al.*,

Respondents.

Case No.: 2:21-cv-00942-APG-EJY

**UNOPPOSED MOTION FOR  
ENLARGEMENT OF TIME TO FILE  
ANSWER TO REMAINING CLAIMS IN  
PETITION FOR WRIT OF HABEAS  
CORPUS (ECF NO. 1)**

**(FIRST REQUEST)**

Respondents move this Court for an enlargement of time of 45 days from the current due date of September 23, 2022, up to and including November 7, 2022, in which to file their answer to the remaining claims in Lee Reed's Petition for a Writ of Habeas Corpus Pursuant to 28 U.S.C. § 2254 (ECF No. 1). This motion is made pursuant to FED. R. CIV. P. 6(b) and Rule 6-1 of the Local Rules of Practice and is based upon the attached declaration of counsel. This is the first enlargement of time sought by Respondents for the answer and the request is brought in good faith and not for the purpose of delay.

DATED: September 23, 2022.

AARON D. FORD  
Attorney General

By: /s/ Mariana Kihuen  
Mariana Kihuen (Bar. No. 12241)  
Deputy Attorney General

**DECLARATION OF MARIANA KIHUEN**

STATE OF NEVADA     )  
                                  ) ss:  
COUNTY OF CLARK    )

I, MARIANA KIHUEN, being first duly sworn under oath, deposes and states as follows:

1. I am an attorney licensed to practice law in all courts within the State of Nevada and am employed as a Deputy Attorney General in the Office of the Nevada Attorney General. I have been assigned to represent Respondents in *Lee Reed v. Calvin Johnson, et al.*, Case No. 2:21-cv-00942-APG-EJY, and as such, have personal knowledge of the matters contained herein.

2. This Motion is made in good faith and not for the purpose of delay.

3. The deadline to answer to the remaining claims in Mr. Reed's petition is September 23, 2022.

4. I entered my appearance in this case on May 25, 2022. I have been unable with due diligence to timely complete the answer herein.

5. I have been working diligently on this case and other Federal and State habeas petitions, including *Leroy Hall McCoy v. Calvin Johnson, et al.*, (Case No. 2:21-cv-01966-APG-EJY), *Tommy Stewart v. Calvin Johnson* (Case No. 2:21-cv-01490-APG-BNW), *Kristian Walters v. Perry Russell* (Case No. 3:21-cv-00405-MMD-CSD), *Jesse Noble v. State of Nevada* (Case No. 83024), *Cory Bellante v. State of Nevada* (Case No. A-22-855228-W), *Petition for Interstate Rendition of a Material Witness (Anthony Loy Aragon)* (Case No. C -22-366960-P), etc.

6. I underwent medical surgery on July 19, 2022 and experienced a slower recovery process than initially expected. Consequently, it delayed my ability to meet some deadlines.

7. On September 23, 2022, I communicated with counsel for Mr. Reed via email and telephone regarding this extension. Mr. Christopher R. Oram does not object to this request.

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1           8.       For the foregoing reasons, I respectfully request an enlargement of time of 45 days, up to  
2 and including November 7, 2022, in which to answer to the remaining claims in Mr. Reed's petition.

3           Executed on September 23, 2022.

4                               /s/ Mariana Kihuen  
5                               Mariana Kihuen (Bar No. 12241)

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7                               IT IS SO ORDERED:

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10                              UNITED STATES DISTRICT JUDGE

11                             DATED: September 26, 2022  
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